REMARKS/ARGUMENTS

Claims 1-21 were presented and examined. The Examiner rejected claims 1-6, 8-13, and 15-20 under 35 USC § 102(e), as being anticipated by Mizoguchi *et al.* (U.S. Patent Application Publication No. 2004/0030934), hereinafter "Mizoguchi". The Examiner rejected claims 7, 14, and 21 under 35 USC § 103(a), as being unpatentable over Mizoguchi in view of Taylor (U.S. Patent No. 6,209,004), hereinafter "Taylor". In this response, Applicant has amended claims 3-5, 10-12, and 17-19, canceled claims 1, 2, 8, 9, 15, and 16, and added claims 22-27. Claims 3-7, 10-14, and 17-27 are now pending. Applicant wishes to thank the Examiner for taking the time to discuss this application and the amendments submitted herewith.

Claim rejections under 35 USC § 102(e)

The Examiner rejected claims 1-6, 8-13, and 15-20 under Section 102(e) as being anticipated by Mizoguchi *et al.* In response to the rejection of independent claim 1, Applicant has canceled claim 1 and dependent claim 2 and incorporated the limitations of originally presented claims 1 and 2 into claim 3. The Examiner rejected claim 3 as anticipated by Mizoguchi. Applicant respectfully traverses this rejection because the cited reference does not teach either explicitly or inherently, a graphical password method in which each password document in a series of password documents comprises a plurality of icons and wherein a correct icon on each password document comprises a link to a next password document such that selecting an appropriate sequence of icons produces a corresponding sequence of documents.

An anticipation rejection is proper only when a single reference teaches either explicitly or inherently all of the claim limitations. MPEP 2131 (citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). The anticipation rejection of claim 3 is improper here because Mizoguchi does not teach a relationship between the icons selected on a password document and the sequence of password documents that are presented to the user. In contrast, claim 3 recites that selecting an appropriate sequence of icons produces a corresponding sequence of documents. In other words, the sequence of documents presented as recited in claim 3 is determined by the icons that are selected because the icons represent links to the other documents.

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Mizoguchi does not teach a relationship between the graphical password icons selected on each of a series of documents and the ordering of those documents. The Office Action cited paragraph [0041] of Mizoguchi in rejecting claim 3. The paragraph reads, in relevant part, "once an image is selected, consecutive image pads 4b-4d are displayed in the same manner discussed in FIGS. 2(A) to 2(D) and FIGS. 3(A) to 3(D), and the user selects the recognized image from the next image pad 4b, and so forth." Mizoguchi discussed FIGS 2(A) to 2(D) in paragraph [0034]-[0035]:

> [0034] A sequence of four consecutively displayed image pads is shown in FIGS. 2(A) to 2(D). The four image pads 4a-4d, each made up of nine images in a 3 X 3 array, are displayed consecutively on a computer display for the user to see. The computer display may be a computer monitor or an LCD display on a handheld device such as a PDA, cell phone or the like.

> [0035] Each of the consecutively displayed arrays consists of nine images, wherein a user recognizes (as a result of some initial training) only one of the images out of the nine displayed in each array. Therefore, when the array 4a shown in FIG. 2(A) is displayed, the user may recognize the image above the number 4, for example. When the user selects this image, for example by moving a cursor over the image and clicking on it using a mouse, a subsequent image array 4b as shown FIG. 2(B) is displayed which consists of an array of faces, for example. In this array, the user may recognize the face shown above the number 2, for example. When the user selects this image, a subsequent image array 4c as shown in FIG. 2(C) is displayed, which consists of an array of canine heads, for example. In this array, the user may recognize the dog shown above the number 7, for example. Finally, when the user selects this image, a subsequent image array 4c shown in FIG. 2(D) is displayed which consists of an array of abstract graphic images, for example. In this array, the user may recognize the image shown above the number 7 again, for example, and selects this image which completes user entry of the password.

There is nothing either explicit or inherent in the above text that teaches a relationship between the selected images and the order in which the image pads are presented to the user. The clear implication is that there is no relationship and that the order of image pads presented is independent of the images selected on each image pad. The "faces" image pad is followed by the "canine head" image pad, which is followed by the "abstract graphic image" regardless of which image is selected in each image pad. This invariant ordering of image pads is required in Mizoguchi because the Mizoguchi images are substitutes for numbers. Mizoguchi teaches a

mechanism for enabling users to "remember" a four digit sequence such as a PIN by using an array of images for each digit in the PIN. In this application, the image pads are presented in a consistent sequence (regardless of the images selected by the user) to facilitate user recognition.

In contrast, the relationship between icons and the ordering of password documents presented is intended to identify a user by the sequence of documents that the user visits in arriving at a desired document. Because this limitation is not taught either inherently or explicitly in Mizoguchi, Applicant submits that the anticipation rejection of claim 3 is improper and Applicant would respectfully request the Examiner to reconsider and withdraw the rejection. Claims 4 through 7 been amended where appropriate to dependent on claim 3 and, as such, those claims are also believed to recite matter not anticipated by the cited referenced.

With respect to independent claim 8, Applicant has canceled the independent claim and incorporated the limitations of claim 8 and claim 9 into amended claim 10. For reasons paralleling the reasons indicated above with respect to claim 3, Applicant submits that claim 10 as amended and all claims dependent thereon recited limitations not anticipated by the cited reference. Accordingly, Applicant would respectfully request the Examiner to reconsider and withdraw the rejection of amended claim 10 and its dependent claims.

With respect to independent claim 15, Applicant has canceled the independent claim and incorporated the limitations of claim 15 and claim 16 into amended claim 17. For reasons paralleling the reasons indicated above with respect to claim 3, Applicant submits that claim 17 as amended and all claims dependent thereon recite limitations not anticipated by the cited reference. Accordingly, Applicant would respectfully request the Examiner to reconsider and withdraw the rejection of amended claim 17 and its dependent claims.

In addition to the foregoing, Applicant has presented new claims 22, 24, and 26, which recite a limitation wherein the "links" referenced in the independent claims are HTML links. Support for this claim language is found in the specification as filed in the paragraph beginning on page 6, line 16. Mizoguchi does not disclose or suggest that the images on its image pads represent HTML links. To the contrary, as discussed above, using HTML links in Mizoguchi is contrary to Mizoguchi intention of presenting the user with a consistent sequence of image pads to facilitate the user's memory of a graphic substitute for a PIN. Accordingly, Applicant submits

that the use of HTML links as recited in the new claims is neither taught nor suggested by the cited reference.

In addition to the foregoing, Applicant has introduced new claims 23, 25, and 27 which recites detecting a user's selection (of icons) includes comparing a sequence of web pages visited to a previously determined sequence of web pages. Support for this claim language is found in the specification as filed in the paragraph beginning on page 6, line 16. These new claims recite explicitly that using icons that represent HTML links is done in conjunction with a verification technique in which a sequence of web pages visited is used to verify the user. Mizoguchi neither teaches nor suggests a limitation in which a sequence of web pages visited by the user is used to verify the identity of the user. There is simply nothing in Mizoguchi that describes either generating a sequence of web pages or comparing a sequence of web pages visited to a previously determined sequence of web pages. Accordingly, Applicant submits that the limitations recited in claims 23, 25, and 27 are neither taught nor suggested by the cited reference.

Claim rejections under 35 USC § 103(a)

The Examiner's rejection of claims 7, 14, and 21 under Section 103(a) as being unpatentable over Mizoguchi in view of Taylor is considered moot in view of the amendments to the independent claims.
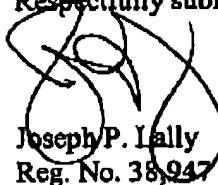
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CONCLUSION

In this response, Applicant has addressed the Examiner's objections, claim rejections under 35 USC § 102(e) and § 103(a). Accordingly, Applicant believes that this response constitutes a complete response to each of the issues raised in the office action. In light of the amendments made herein and the accompanying remarks, Applicant believes that the pending claims are in condition for allowance. Accordingly, Applicant would request the Examiner to withdraw the rejections, allow the pending claims, and advance the application to issue. If the Examiner has any questions, comments, or suggestions, the undersigned attorney would welcome and encourage a telephone conference at 512.428.9872.

Respectfully submitted,

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